

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond) Division

In Re: Julia Alice Crawley

Case No. 15-30121-KRH
Chapter 13

Ocwen Loan Servicing, LLC,
vs.

Julia Alice Crawley, Debtor

Respondents

NOTICE OF OBJECTION TO DEBTOR'S CHAPTER 13 PLAN
AND HEARING THEREON
Real Property at 17168 Chestnut Lane, Milford, Virginia 22514

Ocwen Loan Servicing, LLC, herein, has filed papers with the court objecting to debtor's chapter 13 plan. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

The hearing is scheduled for March 04, 2015 at 11:10 am at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia.

DATE: February 3, 2015

[jm]
/s/ Justina Martynaityte, Esq.
Attorney for Movant
312 Marshall Avenue, Suite 800
Laurel, MD 20707
301-490-1196
bankruptcyva@mwc-law.com
Bar No. 86858

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed, first class, postage prepaid, on February 3, 2015, to Julia Alice Crawley at 17389 New Baltimore Road, Milford, Virginia 22514. Copies were sent electronically via the CM/ECF system to Sean D. Contreras, Attorney for Debtor and Suzanne E. Wade, Trustee.

/s/ Justina Martynaityte, Esq.

**UNITED STATES BANKRUPTCY COURT
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Chapter 13

OBJECTION BY SECURED CREDITOR TO PROPOSED PLAN

Comes now the secured creditor, Ocwen Loan Servicing, LLC, which holds a Deed of Trust secured by the Debtor's real property at 17168 Chestnut Lane, Milford, Virginia 22514, by and through its attorney, Justina Martynaityte, Esq., and objects to the proposed plan and to confirmation and for reason therefore states as follows:

1. The Debtor has proposed a plan which includes a total payment of \$0.00 for arrearages owed to Ocwen Loan Servicing, LLC. The plan is not sufficiently funded to pay this amount or the correct amount of arrearages as noted below.
2. The secured creditor Ocwen Loan Servicing, LLC anticipates filing a Proof of Claim with pre-petition arrearages due in the approximate amount of \$1,052.78.
3. The plan as proposed by the Debtor would therefore be insufficient to pay the claim of Ocwen Loan Servicing, LLC.

Wherefore the Secured Creditor prays this court to enter an Order

1. Denying confirmation of the proposed Chapter 13 Plan, or alternatively
2. Modifying the Chapter 13 Plan to provide for payment in full of the Claim filed by the secured creditor, or alternatively
3. For such other and further relief as the Court deems appropriate.

Respectfully submitted:

/s/ Justina Martynaityte, Esq. [jm]
Attorney for Ocwen Loan Servicing, LLC
312 Marshall Avenue, Ste. 800
Laurel, MD 20707
301-490-1196
Bar No. 86858
Email: bankruptcyva@mwc-law.com

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